

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff,

DARLENE CASE,

Plaintiff-Intervenor,

v.

SITA INFORMATION  
NETWORKING COMPUTING USA,  
INC.,

Defendant.

**Civil Action No.**

1:11-CV-02818-RLV

**MOTION TO SUBSTITUTE EXHIBIT**

To comport with this Court's *Standing Order In Re: Electronic Case Filing Standing Order No. 04-01 And Administrative Procedures*, App. H - A 10, 14-15, Plaintiff-Intervenor, Darlene Case (hereinafter, "Plaintiff"), respectfully files this *Motion to Substitute Exhibits*, as follows:

1.

Plaintiff filed her *Complaint in Intervention* on January 27, 2012. [DE 7].

Inadvertently, Plaintiff's social security number and date of birth were not redacted from Exhibit B.

2.

Upon realizing their error, Plaintiff's counsel immediately contacted the Clerk's Office and notified the Court that Plaintiff's social security number and date of birth had not been redacted from the exhibit.

3.

Plaintiff respectfully requests that the Court substitute the attached, redacted version of Exh. B to DE 7 for the un-redacted version, and that the un-redacted version be placed under seal or otherwise removed from the public record, at the Court's discretion.

Respectfully submitted, this 30<sup>th</sup> day of January, 2012.

**JOYCE THRASHER KAISER & LISS, LLC**

/s/ D. Barton Black  
Kimberly A. Worth  
Georgia Bar No. 500790  
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D. Barton Black  
Georgia Bar No. 119977  
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*Attorneys for Plaintiff-Intervenor*

Five Concourse Parkway  
Suite 2600  
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Telephone: (404) 760-6000  
Facsimile: (404)760-0225

I hereby certify that, pursuant to LR 5.1B, NDGa., the foregoing document was prepared in Times New Roman, 14pt.

/s/ D. Barton Black  
D. Barton Black  
Georgia Bar No. 119977  
bblack@jtklaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served Plaintiff's *Motion for Substitution of Exhibit*, using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Annette I. Idalski  
Chamberlain, Hrdlicka, White, Williams & Martin  
191 Peachtree St., N.E., 34<sup>th</sup> Floor  
Atlanta, GA 30303

James L. Cerwinski  
Ottrell Ferrell Edwards  
Robert K. Dawkins  
Equal Employment Opportunity Commission  
Atlanta District Office  
100 Alabama St., S.W., Suite 4R30  
Atlanta, Georgia 30303

This 30th day of January, 2012.

/s/ D. Barton Black  
D. Barton Black  
Georgia Bar No. 119977  
bblack@jtklaw.com

**JOYCE THRASHER KAISER & LISS, LLC**  
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**EXHIBIT B**

04/30/2010 09:57 PAX

001/001

**SITA**

April 14, 2010

3100 Cumberland Boulevard  
Suite 200  
Atlanta  
Georgia 30339  
USA

Darlene Case  
4641 Jefferson Ridge Way  
Marietta, GA 30066

Telephone:  
+01 770 850 4500  
Fax:  
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[www.sita.aero](http://www.sita.aero)

**COPY FOR YOUR RECORDS**

Dear Darlene,

We are pleased to confirm our verbal offer of employment with SITA as a Personal Assistant, (Grade 4) reporting to Brian Cook. Your initial base salary will be at the annual rate of \$65,000, payable in installments on the 15<sup>th</sup> and the last day of each month. This offer is contingent upon compliance with federal employment requirements and successful background investigation. Your employment will be subject to the policies and procedures of SITA, including the at-will employment policy.

You will be eligible to participate in the SITA Incentive Rewards Program (SIRP) associated with your position, and will be subject to terms and conditions of the SIRP Program. In addition to eligibility for SIRP, you will also be eligible for other health and welfare benefits per our company policy. Your medical/dental benefits will take effect on your date of hire and you may participate in the 401(k) plan on the first day of the month following date of employment. Details regarding these benefits will be discussed during your new hire orientation.

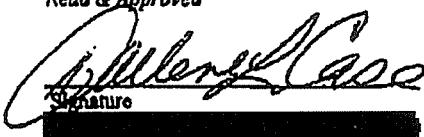
New hire orientation is scheduled every Monday at 9:00 a.m. in the Human Resources Department conference room. On your first day of employment, please report to the receptionist desk in the main lobby of the 3100 Cumberland Blvd Building to establish your employment eligibility as well as your identity. Please be sure to bring two forms of id to the orientation session. Parking is available in the visitor's section of the office building or across the street in the Sear's parking lot.

Please indicate your acceptance of this offer and your start date by signing below and returning this letter and the tax forms to my attention. In addition, please provide us your social security number (SSN) and date of birth (DOB) for our payroll records. We are extremely pleased that you will be joining SITA. If there is anything further I can do to assist you, please do not hesitate to call me at 770-612-2223.

Regards,

  
Scott Parker  
HR Generalist

Read & Approved

  
Signature

5/3/10  
Start Date